

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

Docket No. 2021-349-E

In the Matter of:)
)
Joint Petition of Duke Energy Carolinas, LLC and)
Duke Energy Progress, LLC to Request the)
Commission to Hold a Joint Hearing with the North)
Carolina Utilities Commission to Develop Carbon)
Plan)
)
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**PETITION TO INTERVENE OF
GOOGLE, LLC**

Google, LLC (hereinafter, “Google”), pursuant to Rule 103-825, respectfully submits this petition to intervene in the above-captioned proceeding currently pending before the South Carolina Public Service Commission (the “Commission”). In support of its petition, Google states as follows:

1. On November 9, 2021, Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (collectively, “Duke”) filed a petition with the Public Service Commission of South Carolina (the “Commission”) seeking to hold a joint proceeding with the North Carolina Utilities Commission (the “NCUC”) in connection with Duke’s need to develop a Carbon Plan under North Carolina law.¹

2. DEC and DEP are both investor-owned utilities regulated by the Commission under South Carolina law. S.C. Code Ann. § 58-3-140. The Commission regulates and supervises DEC and DEP as to, among other things, their rates, services, facilities, and practices. *Id.*; *see also* R.

¹ N.C. Gen. Stat. §§ 62-2, 62-30, Part I of Session Law 2021-165 (“HB 951”)

103-810 of S.C. Code of Regs. (citing S.C. Code Ann., §§ 58-27-10 *et seq.*). In addition to retail sales of power, DEC and DEP also sell electricity at wholesale to municipal and cooperative electric utilities in South Carolina and elsewhere.

3. Under North Carolina's HB 951, the NCUC is to develop a Carbon Plan designed to achieve reductions in CO2 emissions from generation facilities owned or operated by DEC and DEP in North Carolina. The law's reduction goals are 70% of 2005 emissions by 2030 and carbon neutrality by 2050.

4. As indicated by the Duke petition, Duke believes that compliance with North Carolina's HB 951 will give rise to issues of cost planning and cost allocation under South Carolina law. To consider those and other issues related to the North Carolina Carbon Plan, Duke proposes a joint proceeding to be held in-person at the NCUC and presided over by the NCUC's Chair.

5. On November 10, 2021, the Commission opened the above-captioned docket to consider the Duke request.

6. In its petition, Duke proposed an expedited schedule for the proceeding. The Commission, however, has not acted on Duke's proposed timeline and no procedural schedule has been established.

7. Google has a strong interest in the outcome of this proceeding. Google is also a multinational technology company, manufacturer, and industry-leading presence in smart and sustainable energy and related technologies. As a technology service provider, Google is an industry-leader in providing expertise and cloud-based technologies that help companies, including power companies, achieve their efficiency, sustainability, and reliability goals. On the other hand, as an energy consumer, Google is the world's largest annual purchaser of renewable energy and continuously innovates looking for opportunities to increase its sustainability. Particular to this proceeding, Google is an end-user of large quantities of Duke-provided energy.

For instance, Google is a direct purchaser of power from DEC in North Carolina and, in South Carolina, is a user of Duke-generated power purchased by Central Electric Cooperative and supplied to Google as a retail customer of Berkeley Electric Cooperative. Google expects that it will continue to be a large user and purchaser of Duke-generated power, including renewable power, in the coming years.

8. Accordingly, Google has a direct and substantial interest in the outcome of this proceeding and will be directly affected by the discussion and resolution of the issues Duke raises. Google has or will have projects or initiatives that may be impacted by the decisions the Commission makes both during and following its review of Duke's request. Any outcomes of this proceeding or related proceedings will likely impact, either expanding or limiting, deployment of Google products and services in South Carolina.

9. Google would add constructively to this matter by clarifying certain issues and contributing to the development of a complete record based on its unique, significant interests as an industry-leading technology company and purchaser of renewable power.

10. Granting Google's request to intervene in this proceeding is in the public interest and is consistent with South Carolina law and the policies of the Commission in encouraging maximum public participation in issues before it.

11. Google's participation will not delay the proceeding in any manner. Google would fully and cooperatively participate in the manner expected of a party to the proceeding. Google's petition is also early in the proceeding and timely.

12. Google's unique interest in this proceeding cannot be adequately represented or protected by any other party.

13. Pursuant to Rule 103-804, Google states that it is represented by the following counsel in this proceeding:

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WHEREFORE, Petitioner Google, LLC, prays that it be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 15th day of November, 2021.

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November 15, 2021

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CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day one copy of the **Petition to Intervene of Google, LLC** to the persons named below at the addresses set forth via electronic mail and/or e-filing:

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/s/ Weston Adams, III
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Columbia, South Carolina
November 11, 2021